

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TROY E. TILLERSON,

Plaintiff,

vs.

THE MEGA LIFE AND HEALTH
INSURANCE CORPORATION, a
corporation; TRANSAMERICA LIFE
INSURANCE COMPANY F/K/A PFL
LIFE INSURANCE COMPANY, a
corporation; NATIONAL ASSOCIATION
FOR THE SELF EMPLOYED A/K/A
NASE, a corporation,

Defendants.

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CASE NO. 3:05-00985-MEF-DRB

JOINT MOTION FOR PROTECTIVE ORDER

COME NOW, the parties and respectfully present a proposed protective order, and as support for the Court's entry of same, say as follows:

"Protected health information" is relevant to the claims or defenses presented in this lawsuit. Thus, in accordance with the requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), Pub. L. No. 104-191, 110 Stat. 1936 (1996), and regulations promulgated thereto, the parties respectfully present to the Court the attached proposed "Qualified HIPAA Protective Order," to be entered by stipulation of counsel for all parties.

WHEREFORE, premises considered, the parties jointly request that the Court enter the attached protective order with respect to HIPAA.

Date: February 2, 2006.

This is e-signed by agreement of all parties.

s/ Steven W. Couch

STEVEN W. COUCH

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